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11 *Proposed Counsel for Official*
12 *Committee of Tort Claimants*

13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION**

19 **-and-**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors**

- 23 ☐ Affects PG& E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 **All papers shall be filed in the Lead Case,*
No. 19-30088 (DM)

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF STEVEN M.
CAMPORA IN SUPPORT OF
OPPOSITION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
TO MOTION OF DEBTORS PURSUANT
TO 11 U.S.C. §§ 105(a), 363, AND 503(c)
FOR ENTRY OF AN ORDER (I)
APPROVING SHORT-TERM
INCENTIVE PLAN AND (II)
GRANTING RELATED RELIEF (Dkt.
No. 782)**

Date: April 9, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16 Floor
San Francisco, CA 94102

1 I, Steven M. Campora, declare as follows:

2 1. I am a partner with the law firm of Dreyer, Babich, Buccola, Wood, Campora
3 LLP. I have been involved with litigation, on behalf of fire and explosion victims and against
4 Pacific Gas and Electric Company, since 2008. I am currently a member of the Plaintiffs'
5 Executive Committee in the CA North Bay Fires JCCP.¹

6 2. I have personal knowledge of the facts contained in this declaration and, if called
7 as a witness, I could and would competently testify thereto. I have review this file for this matter
8 and am familiar with its contents.

9 3. I provide this declaration in support of the Official Committee of Tort Claimants'
10 (hereafter, "TCC") Opposition to the PG&E Corporation and Pacific Gas and Electric Company
11 (hereafter, the "Debtors") Motion Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) For Entry of
12 An Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief.

13 4. On March 8, 2019, I sent Debtors' Counsel an email requesting that the document
14 bearing Bates Numbers PGE-NBF-TAR-0000722832 not to be marked as confidential. On the
15 same day, Debtors' Counsel replied, confirming that the entire document was not confidential.
16 Attached hereto as **Exhibit A** is a true and correct copy of the email dated March 8, 2019.

17 5. Attached as **Exhibit B** is a true and correct copy of an email dated March 11, 2019
18 where Debtors' Counsel confirmed that the two documents bearing Bates Numbers PGE-NBF-
19 TAR-0003250382 and PGE-NBF-TAR-00003350385) were "[n]ot confidential."

20 6. Attached as **Exhibit C** is a true and correct copy of an email, dated February 26,
21 2014 with Bates Number PGE-NBF-TAR-0000722832, which was produced by PG&E.

22 7. Attached as **Exhibit D** is a true and correct copy of an email dated November 1,
23 2016, with attachment, bearing Bates Number PGE-NBF-TAR-00003250382.

24 8. Pursuant to the terms of the Protective Order entered in the California North Bay
25 Fire Cases, JCCP 4955, "the party producing the document represents that the document is a true
26 and correct copy of the original." Exhibits C and D were produced by PG&E under the terms of
27 that order.

28 _____
¹ The JCCP refers to the Judicial Council Coordinated Proceedings.

1 I declare under penalty of perjury under the law of the State of California that the
2 foregoing is true and correct.

3 Executed on this 28th day of March, at Sacramento, California.

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5 By: 

6 Steven M. Campora
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